

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

New York Marine and General Insurance Co. v.
Al Qaida, et al. (04-CV-6105)

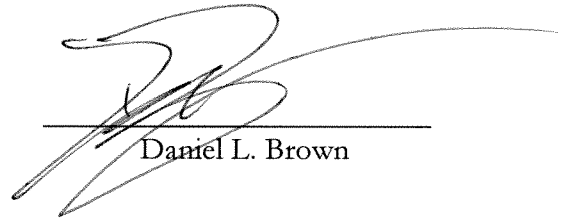
**DECLARATION OF DANIEL L. BROWN IN SUPPORT OF DEFENDANT
IBRAHIM BIN ABDUL AZIZ AL-IBRAHIM FOUNDATION'S MOTION TO DISMISS**

Daniel L. Brown declares as follows:

1. I am associated with the law firm of Sheppard, Mullin, Richter, and Hampton LLP, counsel to the Ibrahim Bin Abdul Aziz Al-Ibrahim Foundation (the "Foundation"). I submit this declaration in support of the Foundation's motion to dismiss the complaint in the above-captioned action.
2. Attached hereto as Exhibit A is a true and correct copy of the article entitled Islam in Uzbekistan: Implications of 9/11 and Policy Recommendations for the United States, by Odil Ruzaliev, from the Journal of Muslim and Minority Affairs.
3. Attached hereto as Exhibit B is a true and correct copy of the Nairobi Non-Governmental Organizations Bureau's Notification of Intended Cancellation of Registration, dated December 15, 1998.
4. Attached hereto as Exhibit C is a true and correct copy of the Order by the Honorable Justice Mulwa of the High Court of Kenya, Nairobi, quashing the cancellation of the Foundation's certificate of registration, dated December 18, 1998.

5. Attached hereto as Exhibit D is a true and correct copy of the report entitled Human Rights Watch, World Report 1999, Kenya: Human Rights Developments.

6. Attached hereto as Exhibit E hereto is a true and correct copy of the RICO Statement Applicable to Al-Haramain Islamic Foundation, Inc. (USA) a/k/a Al-Haramain a/k/a Al-Haramain Foundation in New York Marine and General Insurance Company v. Al Qaida, et al., 04 Civ. 6105 (RCC), dated December 23, 2004.


Daniel L. Brown

Sworn to and Subscribed Before Me,
This 3rd Day of October, 2005.

Signed: Stacey Bell
Notary Public

STACEY A. BELL
Notary Public, State of New York
No. 02BE6066599
Qualified in Kings County
Commission Expires November 19, 2005